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February 20, 2025

MEMO ENDORSED
By ECF

The Honorable Katherine Polk Failla
 United States District Court for the Southern District of New York
 40 Foley Square, Courtroom 618
 New York, New York 10007

Re: *Dinosaur Financial Group LLC et al. v. S&P Global, Inc. et al.*, No. 22-cv-1860

Subject: Sealing Request Regarding Plaintiffs' Response to Defendants' Motion for Discovery of Absent Class Members

Dear Judge Failla:

We represent Plaintiffs Hildene Capital Management, LLC, Dinosaur Financial Group LLC, and Swiss Life Capital Management (collectively “Plaintiffs”). Plaintiffs are filing today their response to Defendants’ motion to preclude class expansion and damages theories (ECF No. 167). Pursuant to the Protective Order (ECF No. 125) and Rule 9 of this Court’s Individual Rules of Civil Procedure (“Rule 9”), Plaintiffs request permission to file their response in partially redacted form and seal the documents attached as exhibits to the response, except for Exhibits A, B, C, and D (“Sealed Exhibits”).

In accordance with Rule 9, Plaintiffs are filing: (i) a redacted version of their response to Defendants’ motion with Sealed Exhibits; and (ii) a copy of the response with proposed redacted and exhibits in selected view. Pursuant to Rule 9.B.ii., Plaintiffs will also email Chambers with copies of these documents.

The Sealed Exhibits contain, paraphrase or quote “Discovery Material” that has been designed as “Protected Material” by Defendant FactSet Research Systems Inc. (“FactSet”) under the Protective Order. (ECF No. 125). The Sealed Exhibits do not contain information concerning Plaintiffs, and Plaintiffs take no position on whether those documents should appropriately be deemed confidential. Plaintiffs are seeking permission to seal these materials to comply with the Protective Order and Rule 9. Plaintiffs reserve the right to challenge FactSet’s confidentiality designations as appropriate.

Respectfully submitted,

/s/ Ronald J. Aranoff

Ronald J. Aranoff

Lyndon M. Tretter

/s/ Leiv Blad

Leiv Blad

Jeffrey Blumenfeld

Reuben B. Bauer
WOLLMUTH MAHER & DEUTSCH LLP
500 Fifth Avenue, 12th Floor
New York, New York 10110
Telephone: (212) 382-3300
Email: raranoff@wmd-law.com
ltretter@wmd-law.com
rbauer@wmd-law.com

Meg Slachetka
COMPETITION LAW PARTNERS PLLC
1101 Pennsylvania Ave., NW
Washington, DC 20004
Telephone: (202) 742-4300
Email: leiv@competitionlawpartners.com
jeff@competitionlawpartners.com
meg@competitionlawpartners.com

/s/ Robert N. Kaplan
Robert N. Kaplan
Gregory K. Arenson
Elana Katcher
KAPLAN FOX & KILSHEIMER LLP
850 Third Ave., 14th Floor
New York, NY 10022
Telephone: (212) 687-1980
Email: rkaplan@kaplanfox.com
garenson@kaplanfox.com
ekatcher@kaplanfox.com

Cc: Counsel of record (*via ECF*)

Application GRANTED. The Clerk of Court is directed to maintain docket entry 175 under seal, viewable to the Court and the parties only.

The Clerk of Court is further directed to terminate the pending motion at docket entry 173.

Dated: February 25, 2025
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE